

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Joshua Michael Zartman

Debtor(s)

Lawrence V. Young, Esq.

vs.

NewRez LLC, d/b/a Shellpoint Mortgage Servicing

Respondent

CHAPTER 7

CASE NO. 21-02405 HWV

**RESPONSE OF NEWREZ LLC, D/B/A SHELLPOINT MORTGAGE SERVICING TO
TRUSTEE'S MOTION FOR SALE OF PROPERTY FREE AND CLEAR**

Respondent, NewRez LLC, d/b/a Shellpoint Mortgage Servicing, by and through its counsel, KML Law Group, P.C. , hereby responds to the Trustee's Motion for Sale of Property Free and Clear as follows:

1. Respondent's loan is secured by a mortgage on Debtor's Property located at 719 Grant Drive, Hanover, PA 17331.
2. The proposed order calls for the Property to be sold free and clear of all encumbrances at a sale price that is less than Respondent's total debt.
3. Respondent objects to Trustee's Motion to the extent that Trustee's proposed Order does not provide for Respondent's loan to be paid in full at the time of sale, subject to a proper payoff quote, or that the lien will otherwise remain on the Property.

Wherefore, Respondent respectfully requests that Debtor's Motion be denied.

/s/ Rebecca A. Solarz, Esquire

Rebecca A. Solarz, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
(215) 627-1322
Attorney for Respondent

Date: February 21, 2022